

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

LA MICHOACANA NATURAL, LLC
a North Carolina limited liability company,

Plaintiff,

vs.

Civil Complaint No.

LUIS MAESTRE, an individual, d/b/a
LA MICHOACANA and/or LA LINDA
MICHOACANA; ADRIANA TERAN,
an individual, d/b/a LA MICHOACANA
and/or LA LINDA MICHOACANA;
and LA MICHOACANA, a business entity,
form unknown.

Defendants.

AFFIDAVIT OF STEPHEN L. ANDERSON

I, Stephen L. Anderson, submit this further affidavit pursuant to Local Civil Rule 83.1(B)(1) in support of my Motion for Admission *pro hac vice* on behalf of the Plaintiff in this action. I hereby declare pursuant to 28 U.S.C. § 1746 as follows:

1. My full name is Stephen Lee Anderson. My office address is 31285 Temecula Pkwy. Suite 240 Temecula, California, 92592. Phone (951) 296-1700.

2. I am an attorney and member in good standing of the State Bar of California. I have been a member of the California bar for twenty-seven years since I was admitted on December 4, 1990. I have also been admitted to practice before and am a member in good standing of the bars of the United States District Court for the Northern

District of California, the U.S. District Court for the Central District of California, and the U.S. District Court for the Southern District of California.

3. I have previously been admitted to practice *PRO HAC VICE* in each of the following Courts and matters:

- a. United States District Court for the District of Columbia
PALETERIA LA MICHOCACANA, INC. et al. v. PRODUCTOS LACTEOS TOCUMBO S.A. de C.V.
(Case 1:11-cv-01623-RC)
- b. United States District Court for the District of Arizona (Phoenix Division)
Center for Computer Technology, Inc. v. Domains by Proxy, Inc. et. al.
(Case No.: 2:05-cv-03921-EHC);
- c. United States District Court for the Northern District of Georgia
Biotechne Complex v. Joseph Barra
(Case No. 1:03-cv-00960-JTC);
- d. United States District Court for the District of New Jersey
Checkers Alive Games v. Pressman Toy Corporation, et. al.
(Case No. 2:03-cv-01003-WHW-SDW).

4. There are no disciplinary complaints pending against me for any violations of the rules of any Court and I have not been suspended or disbarred for disciplinary reasons from practice in any court. However, in 2001, I was placed on 18 months of probation (with a suspension stayed) by the California State Bar as the result of a traffic stop occurring in December 1998, of which I was convicted of a misdemeanor charge of making a false statement to a police officer, after I had identified myself as a deputy district attorney during such traffic stop although I was no longer employed in such position. Further, according to the State Bar report:

"Although he tried to clarify his status three times during the conversation, the officer would not let him. Before charges were filed, Anderson told the police he was no longer a DA.

His actions amounted to an act of moral turpitude.

In mitigation, Anderson has no record of discipline, no one was harmed by his action, he demonstrated remorse and he cooperated with the bar's investigation."

I successfully completed such probation nearly fifteen years ago and have had no other issues with any State Bar ever since.

5. I have associated with local counsel in this matter namely: Al P. Allan of Allan IP Litigation with an address and telephone number of 409 East Boulevard, Charlotte, NC 28203' Tel: 704-371-5605.

6. I do not work at or maintain an office outside of the State of California. I am not a member of the North Carolina bar, nor do I have an application for membership pending. I do not engage in practice, or hold out to practice law in the State of North Carolina.

7. I have not applied for admission *pro hac vice* nor have I been admitted *pro hac vice* to this Court at any time in the past.

I hereby declare under the penalty of perjury that the foregoing is true and correct.

Dated: November 28, 2017
Temecula, California

Respectfully submitted

By: /s/ Stephen L. Anderson
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